

IN THE DISTRICT COURT OF MARYLAND FOR WORCESTER COUNTY

STATE OF MARYLAND

vs.

RACHEL A. WILLIS

Defendant.

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Case No. D025CR22000939

DISCOVERY REQUEST

The Defendant, through counsel, respectfully requests all discovery in the above captioned matter, pursuant to the United States Constitution, the Maryland Declaration of Rights, and the directives of Maryland statutory law.

Without limiting the scope of the above request, the Defendant specifically requests: 1) all impeachable convictions in the last 15 years of each witness the State intends to call at a hearing or trial; 2) all written, recorded or adopted statements of the witnesses that the State intends to call; 3) all written and oral statements of the Defendant; 4) all written or verbal reports of experts the State intends to use at a hearing or trial; 5) all exhibits the State intends to use at trial, including copies of the original arrest warrant; 6) all relevant material regarding searches, seizures, interrogations and pre-trial identification's of the Defendant; and 7) that pursuant to *Kyles v. Whitley*, 514 U.S. 419 (1995), the prosecutor search for exculpatory evidence that may exist outside of his/her case file.

If providing discovery electronically, please send to discovery@jezicfirm.com.

Respectfully submitted,

_____/S/_____
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Discovery Request was electronically filed and a copy will be electronically delivered this 19 day of September 2022 to:

State's Attorney's Office
106 Franklin Street
Snow Hill, MD 21863

_____/S/_____
Andrew V. Jezic